

RICHARD E. DONALDSON, ESQ., CHTD.  
RICHARD E. DONALDSON, ESQ.  
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Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \* \* \*

FRANCES E. SWARTZ )  
)  
)  
Plaintiff, )  
)  
vs. ) CIVIL ACTION NO. 2:15-cv-01811-JAD-PAL  
)  
)  
CAROLYN COLVIN )  
COMMISSIONER OF SOCIAL )  
SOCIAL SECURITY )  
)  
Defendant. )  
\_\_\_\_\_ )

**MOTION FOR AN EXTENSION OF TIME TO FILE A**

**MOTION FOR REVERSAL/REMAND**

(First Request)

FRANCES E. SWARTZ by and through her counsel of record, Richard E. Donaldson, Esq. respectfully moves for a thirty-one (31) day extension of time to and including Monday, April 25, 2016 in which to file a Motion for Reversal/Remand. The briefing schedule [Doc. #14] currently requires that this motion be filed by **March 23, 2016**. Counsel became aware of a new Social Security Ruling (SSR 16-3) that may [or may not] bear on the outcome of this litigation, and requires additional time to consider what effects the new Ruling would have on any future proceedings, should there be any.

This request is being filed as a Motion as undersigned Counsel attempted to contact April Alongi, Esq., of the Office of General Counsel, and counsel of record for the Defendant, but she is unavailable at this time. However, attorneys at the Office of General

Counsel have not opposed undersigned Counsel's Motion(s) for Extension of Time in forty-three years, he cannot think of any reason the OGC would start now, requests to allow extensions of time have always been routinely accepted as a matter of courtesy, the Defendant would not be prejudiced in any way, and on that basis believes that Ms. Alongi or the Office of General Counsel would have no objection to this Motion.

The Federal Rules of Civil Procedure provide for an enlargement of time for cause shown.

When an act may or must be done within a specified time, the court may, for good cause, extend the time . . . if a request is made, before the original time or its extension expires . . . .

Fed. R. Civ. P., Rule 6(b).

This request is made prior to the expiration of time permitted to file a Motion to Reversal/Remand.

DATED this 22nd day of March, 2016.

Respectfully submitted,

RICHARD E. DONALDSON, ESQ., CHTD.

Richard E. Donaldson  
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Attorney for Plaintiff

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

Jerry A. Green

March 25, 2016  
Date: -----